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6 Attorney for: Quantum3 Group, LLC, as agent for MOMA Trust LLC,
7 an assignee of Sierra Auto Finance
8 JM-5630

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10 UNITED STATES BANKRUPTCY COURT

11 DISTRICT OF NEW JERSEY

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13 In re:) Case No. 19-16308 (ABA)
14 GIRVISH PHELPS) Chapter 13
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Quantum3 Group, LLC, as agent for MOMA Trust LLC, an
assignee of Sierra Auto Finance ("Quantum3"), a secured
creditor of the Debtor, objects to the Debtor's Modified
Plan for the following reasons:

a. Quantum3 objects to the Debtor's proposal to cure post-
petition arrears through his Chapter 13 Plan. The Debtor
is bound by the terms of the Plan confirmed on
October 10, 2019, which provided that only pre-petition
arrears are to be cured through the Plan, with post-
petition payments to be made directly to Quantum3 by the
Debtor.

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1 b. Quantum3 credit reserves the right to object to the
2 feasibility and good faith of this Plan and filing.
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7 /s/ William E. Craig
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William E. Craig, attorney for
Quantum3 Group, LLC, as agent for
MOMA Trust LLC, an assignee of Sierra
Auto Finance

Date: 3-17-21